

REMARKS/ARGUMENTS

Prior to the entry of this Amendment, claims 1, 3-5, 7-18, 20-24, 26-31, and 33-39 were pending in this application. Claim 1, 4, 10-12, 18, 21, 23, 24, 27, 29, 31, 34, 36, 37, and 39 have been amended, claims 15, 16, 20, 22, 26, 28, 33, 35, and 38 have been canceled, and new claims 43-54 have been added herein. Therefore claims 1, 3-5, 7-14, 17, 18, 21, 23, 24, 27, 29-31, 34, 36, 37, 39, and 43-54 remain pending in the application. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

35 U.S.C. § 103 Rejection, Schneider in view of Dobbins, further in view of Liu

The final Office Action has rejected claims 1, 3-5, 7-18, 20-24, 26-31 and 33-42 under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6,408,336 of Schneider et al. (hereinafter "Schneider") in view of U. S. Patent Publication No. 2002/0066033 of Dobbins et al. (hereinafter "Dobbins"), and further in view of U.S. Patent No. 6,839,680 to Liu et al. (hereinafter "Liu"). The Applicants respectfully traverse the rejection and submit that the final Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, all claimed limitations must first be taught or suggested by the prior art. See, e.g., *DyStar Textilfarben GmbH & Co. Deutschland KG v. C.H. Patrick Co.*, 464 F.3d 1356, 1360 (Fed. Cir. 2006). The Office Action must then provide an explicit analysis supporting the rejection. See *KSR Int'l Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 1741 (2007) ("a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art"). While the Office Action can use one of several exemplary rationales from the MPEP to support an obviousness rejection under *KSR*, all the rationales still require the Office Action to demonstrate that all the claim elements are shown in the prior art. See MPEP §2143. As will be

discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation. For example, none of the references, alone or in combination, teach or suggest accessing an attribute of an identity profile of a group that identifies a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from a group. The references also do not teach or suggest, alone or in combination, updating an attribute of an identity profile for the group based on such a policy and updating membership of a second group based on the first group being a member of the second group.

As discussed previously, Schneider is directed to "control of access to data in a distributed environment" (col. 1, lines 32-33) and more specifically to making access filters more scalable by decentralizing administration of these filters (col. 5, line 66 - col. 6, line 1). More specifically, Schneider discloses three types of policies, an access policy, an administrative policy, and a policy maker policy. Under Schneider, an access policy defines a user's or group's rights to access particular information while the administrative policy defines a user's ability to or rights to modify membership, i.e., defines who has administrative rights to add or remove members. However, as noted previously and as noted in the final Office Action, Schneider does not teach or suggest a plurality of policies for self-subscribing to and self-unsubscribing from a group. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group. The process of adding or removing user to a group under Schneider is then carried out by these designated administrators in a manner similar to that described in the background section of the pending application. In other words, Schneider's administrative policy defines who can act as an administrator, i.e., who can change group membership, but "the administrators who have control over a user group are responsible for correctly defining membership in the user group." (Col. 16, lines 8-11, see also Background of the pending application, page 2, lines 20-28) Further and also as noted in the final Office Action, Schneider does not teach or suggest updating an attribute of an identity profile for the group, i.e., based on application of the policy.

In an attempt to demonstrate a teaching of policies for self-subscribing to or self-unsubscribing from a group, the final Office Action introduces Dobbins. Dobbins is directed to "a content management system . . . that links network providers, content providers, and subscribers for developing, distributing, managing, and paying for content resources."

(paragraph 15) As such, Dobbins aims to "transfer or make available as much of the administration functionality as possible to either the content provider of the subscriber."

(paragraph 15) Under Dobbins, "the subscriber interacts with the Web-based DPG by clicking on hyperlinks." (paragraph 38) "Examples of requests bound to links are: subscribe or unsubscribe the subscriber to service bundles; schedule services to be started or stopped at some future time; request details about a service offer." (paragraph 38) Dobbins also describes allowing the subscriber to modify personal information, portal preferences, subscription information, etc. (paragraphs 39-43) However, Dobbins does not teach or suggest, alone or in combination with Schneider, a plurality of policies for self-subscribing to and self-unsubscribing from a group. Rather, Dobbins describes allowing a user to select content packages and update personal information and preferences. The Applicants do not agree that Dobbins description of allowing a user to select content packages in any way teaches or suggests policies for self-subscribing to and self-unsubscribing from a group as recited in the pending claims. However, assuming for the sake of argument such a reading of Dobbins, neither Schneider no Dobbins, alone or in combination, teach or suggest updating an attribute of an identity profile for the group based on such a policy. Furthermore, neither reference, alone or in combination, teaches or suggests also adding the first entity to a second group based on the first group being a member of the second group.

In an attempt to demonstrate a teaching of updating an attribute of an identity profile for the group, i.e., based on application of the policy for self-subscription and/or self-unsubscription, the final Office Action introduces Liu. Liu is directed to "the analysis of the behavior and interests of users of online networks, and more particularly to the analysis and modeling of user's interests for users of the Internet and World Wide Web." (Col. 1, lines 7-10)

More specifically, Liu describes "a system and methodology, and various software products that tracks user activity across multiple domains, and from such activity develops a time based model that describes the user's interests over time." (Col. 2, lines 15-18) "The changing user interests are also used to determine each user's membership in any number of defined user groups." (Col. 2, lines 19-20) "Each user's time based model of interests and group memberships forms a detailed profile of the Internet activity that can be used to market information and products to the user, to customize web content dynamically, or for other marketing purposes." (Col. 2, lines 21-25) However, Liu also does not teach or suggest, alone or in combination with the other references, updating an attribute of an identity profile for the group, i.e., based on application of the policy for self-subscription and/or self-un-subscription. Rather, Liu describes updating a profile for a user to indicate the group memberships of a user for tracking purposes, not updating an attribute of an identity profile of the actual group based on application of the policy for self-subscription and/or self-un-subscription.

Claim 1, upon which claims 3-5, 7-14, 17, and 43-48 depend, and claim 24, upon which claims 27, 29, 30, and 49-54 depend, each recite in part "accessing an attribute of an identity profile of the first group, the attribute identifying a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group; adding said first entity to said first group as a static member based on said first policy, wherein adding said first entity to said first group as a static member comprises updating an attribute of an identity profile for the first group to include the first entity; and adding said first entity to a second group as a nested member based on said first group being a member of said second group." None of the references teach or suggest, alone or in combination, accessing an attribute of an identity profile of a group that identifies a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from a group. The references also do not teach or suggest, alone or in combination, updating an attribute of an identity profile for the group based on such a policy and updating membership of a second group based on the first group being a member of the second

group. For at least these reasons, claims 1, 3-5, 7-14, 17, 24, 27, 29, 30, and 43-54 should be allowed.

The dependent claims are thought to be allowable for additional reasons. For example, none of the references teach or suggest said plurality of policies includes an open policy, an open with filter policy, a controlled through workflow policy, and a closed policy, wherein the open policy is less restrictive than the open with filter policy, the open with filter policy is less restrictive than the controlled through workflow policy, and the controlled through workflow policy is less restrictive than the closed policy as recited in claims 4 and 27. In another example, none of the references teach or suggest an identity profile of said second group includes an attribute identifying from the plurality of policies a policy for changing static membership of said second group; adding said first entity to the second group is performed only if said first policy is not less restrictive than the policy for changing static membership of said second group; and adding said first entity to said second group as a nested member provides said first entity with membership privileges in said second group as recited in claims 12 and 23. New claims 43-54 are thought to be allowable for at least the additional reason that the references do not teach or suggest, alone or in combination, membership expansion as recited in the new claims.

Claim 18, upon which claims 21 and 23 depend, and claim 31, upon which claims 34 and 36 depend, each recite in part "receiving from a first static member a request to remove the first static member from a first group; accessing an attribute of an identity profile of the first group, the attribute identifying a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group; removing said first static member from said first group based on said first policy, wherein removing said first entity to said first group as a static member comprises updating an attribute of an identity profile for the first group to remove the first entity; and removing said first static member from a second group based on said first group being a member of said second group." None of the

references teach or suggest, alone or in combination, accessing an attribute of an identity profile of a group that identifies a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from a group. The references also do not teach or suggest, alone or in combination, updating an attribute of an identity profile for the group based on such a policy and updating membership of a second group based on the first group being a member of the second group. For at least these reasons, claims 18, 21, 23, 31, 34, and 36 should be allowed.

Claim 37, upon which claim 39 depends, recites in part "receiving from a first entity a request to add the first entity to a first group, accessing an attribute of an identity profile of the first group, the attribute identifying a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group, adding said first entity to said first group as a static member based on said first policy, wherein adding said first entity to said first group as a static member comprises updating an attribute of an identity profile for the first group to include the first entity, adding said first entity to a second group as a nested member based on said first group being a member of said second group, receiving from the first static member a request to remove the first static member from the first group, removing said first static member from said first group based on said first policy, wherein removing said first entity to said first group as a static member comprises updating the attribute of the identity profile for the first group to remove the first entity, and removing said first static member from the second group based on said first group being a member of said second group." None of the references teach or suggest, alone or in combination, accessing an attribute of an identity profile of a group that identifies a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from a group. The references also do not teach or suggest, alone or in combination, updating an attribute of an identity profile for the group based on such a policy and updating membership of a second group based on the first group being a member of the second group. For at least these reasons, claims 37 and 39 should be allowed.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

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Respectfully submitted,

/William J. Daley/

William J. Daley
Reg. No. 52,471

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 303-571-4000 (Denver office)
Fax: 303-571-4321 (Denver office)
WJD:jep

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